

HH/CS

UNITED STATES DISTRICT COURT

for the

Southern District of Ohio

United States of America

v.

Case No.

2:18-mj-636

GRANT MICHALSKI
221 N. Front Street, Unit 105
Columbus, OH 43215

Defendant(s)

CRIMINAL COMPLAINT

I, the complainant in this case, state that the following is true to the best of my knowledge and belief.

On or about the date(s) of January 2014 to August 2018 in the county of Franklin in the
Southern District of Ohio, the defendant(s) violated:

Code Section

Offense Description

18 U.S.C. 2252

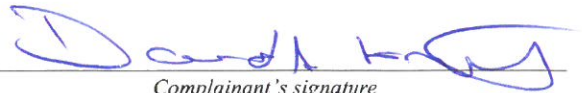
Possession and/or receipt of visual depictions of minors engaged in sexually
explicit conduct via the internet

18 USC 2252A

Possession and/or receipt of child pornography via the internet

This criminal complaint is based on these facts:

See attached Affidavit incorporated herein by reference.

☒ Continued on the attached sheet.

Complainant's signature

David A. Knight, Special Agent, FBI

Printed name and title

Sworn to before me and signed in my presence.

Date:

Aug. 23, 2018

City and state:

Columbus, Ohio



Judge's signature

Kimberly A. Jolson, Magistrate Judge

Printed name and title

**UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF OHIO
EASTERN DIVISION**

In the Matter of the Criminal Complaint:)

United States of America v. Grant Michalski 221 N. Front Street, Unit 105 Columbus, OH 43215))))))	Case No. Magistrate Judge Jolson
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AFFIDAVIT IN SUPPORT OF CRIMINAL COMPLAINT

I, David A. Knight, a Special Agent with the Federal Bureau of Investigation (FBI), being first duly sworn, hereby depose and state:

1. I, Special Agent David A. Knight (your affiant), submit this affidavit in support of a criminal complaint to arrest for violations of 18 U.S.C § 2252 and 2252A – certain activities relating to material involving the sexual exploitation of minors. Since this affidavit is being submitted for the limited purpose of securing a criminal complaint and arrest warrant, your affiant did not include each and every fact known concerning this investigation. Your affiant did not withhold any information or evidence that would negate probable cause. Your affiant set forth only the facts that are believed to be necessary to establish probable cause that Grant MICHALSKI committed the violation listed above.

2. Your affiant is a Special Agent with the FBI assigned to the Cincinnati Division, and I have been a Special Agent since August 2007. I am currently assigned to the FBI Child Exploitation Task Force, investigating matters involving the online exploitation of children and child pornography. Prior to joining the FBI, I was a Columbus, Ohio Police Officer for 8 years, also working on the FBI Child Exploitation Task Force. I have made arrests and have executed search warrants pertaining to these types of investigations. I have received both formal and informal training in the detection and investigation of computer-related offenses. As part of my duties as a Special Agent, I investigate criminal child exploitation and child pornography violations, including the illegal production, distribution, transmission, receipt, and possession of child pornography, in violation of 18 U.S.C. §§ 2251, 2252(a), and 2252A. Your affiant has been involved in hundreds of investigations involving internet crimes against children, resulting

in dozens of felony arrests and convictions. As a Special Agent, I am authorized to investigate violations of the laws of the United States.

A. William Weekley is apprehended and indicted for violations of 18 U.S.C. §§ 2251, 2252, and 2422(b).

3. Larry McCoy is a Task Force Officer (TFO) with the FBI assigned to the Cincinnati Division and has been since February 2017. He is a Special Agent with the Ohio Bureau of Criminal Identification and Investigation (BCI), and is currently assigned to the Ohio BCI Crimes Against Children Unit. He is also assigned to the FBI Child Exploitation Task Force, investigating matters involving the online exploitation of children and child pornography.

4. As part of his duties as an Investigator with BCI and FBI, TFO McCoy initiated an undercover investigation to find and apprehend individuals involved in the online exploitation of children. On January 9, 2018, posing as a recently divorced father, McCoy posted an online ad entitled “Taboo Dad chat” on the Craigslist website looking to chat with others regarding “taboo stuff.” McCoy received a reply email to the ad via the Craigslist email network from an individual later identified as William Weekley.

5. In his email, Weekley indicated that he was a dad who “likes perv and kinky wierd things” and suggested that McCoy contact him on the “Wickr” application, providing his Wickr handle/username as “funforfun83.” McCoy used the Wickr app¹ to contact Weekley, and, over the course of the next several days, engaged in conversations with him regarding Weekley’s sexual interest in minors. During these conversations, Weekley informed McCoy that he engaged in various sex acts with a minor female he had regular access to, hereinafter referred to as Jane Doe. In response, McCoy expressed interest in engaging in sexual activity with his fictitious minor daughter, and Weekley provided tips and guidance to McCoy regarding how to get McCoy’s fictitious minor daughter to engage in sexual activity.

6. During an ensuing conversation in which Weekley described having Jane Doe perform oral sex on him, McCoy stated, “I would like to see that.” A short time later, Weekley

¹ Wickr is a messaging app that allows users to send end-to-end encrypted and content-expiring messages that may include photo, video and other file attachments. A user can set the expiration time period for their encrypted communications, anywhere between three seconds and six days. Once the time period set by the user has been reached, the entire message is deleted and unrecoverable. Any content of communications that is stored by Wickr is encrypted and cannot be provided in an unencrypted format.

sent McCoy a photo of a white female, approximately ten to eleven years old, performing fellatio on a white male. McCoy asked Weekley if the picture depicted Jane Doe, and Weekley stated it did.

7. Between January 12 and 17, 2018, McCoy and Weekley engaged in further conversations, during which Weekley sent McCoy numerous additional photographs of Jane Doe. These included a nude photo of a Jane Doe lying on a bed with her legs open and her vagina clearly visible. Other photos depicted Jane Doe in lingerie and performing fellatio on an adult male. Weekley also sent McCoy photos of Jane Doe performing fellatio on a black dog and the dog licking Jane Doe's vagina.

8. Weekley was arrested pursuant to a federal arrest warrant on January 17, 2018. He was subsequently indicted on numerous charges, including violations of 18 U.S.C. §§ 2251, 2252, and 2422(b).

9. During a post-arrest interview, Weekley eventually admitted to engaging in sexual activity with Jane Doe and engaging in the Wickr conversation with TFO McCoy, in which he sent the sexually explicit photos of Jane Doe to McCoy. Weekley further admitted that he had also been communicating with people via Craigslist.

B. Investigation of Weekley's Craigslist activity reveals that Weekley and Grant MICHALSKI engaged in discussions regarding sexual activity with Jane Doe.

10. Weekley's cellular phone was seized from his place of employment, and was subsequently forensically examined. Numerous pornographic images of Jane Doe, as well as portions of numerous email exchanges, were found on Weekley's phone. The majority of these email exchanges appeared to be related to Craigslist ads that Weekley had posted or responded to and involved discussions of various types of sexual activity, including Weekley's sexual activity with Jane Doe. The email address that Weekley used during these communications was williamweekley1212@gmail.com, which is the same email address that he utilized to communicate with TFO McCoy. No emails prior to early January of 2018 were recovered from the phone.

11. On March 27, 2018, a search warrant was served on Google, Inc. for the content related to Weekley's email account, williamweekley1212@gmail.com. The results of that search warrant that were provided by Google largely mirrored the email content that was recovered from Weekley's ZTE cellular phone. Similar to the information found on Weekley's cell phone,

however, there was no content available prior to mid-December of 2017. Based on comments Weekley made in various text message and email conversations, law enforcement has reason to believe that this is because Weekley regularly deleted email.

12. Through comparison of Weekley's emails to information provided by Craigslist, as further described below, it was determined that Weekley engaged in conversations, known or believed to be about sexual activity with minors, with the user of the email account of colsbuckeye315@gmail.com.

13. Based on the nature of the emails found on Weekley's phone and in his gmail account, numerous subpoenas were issued to Craigslist to determine the nature of the ads Weekley placed and responded to and the email addresses with whom he communicated. Information received from Craigslist confirmed that, since at least May 2017,² Weekley was posting and responding to advertisements on the Craigslist website, and engaging in communications via the Craigslist email platform. Many of the ads that Weekley placed or to which he responded on Craigslist contained references to "taboo," "dirty" or "perv" things, which, based on your affiant's training and experience, are terms often used to indicate a sexual interest in minors. In particular, Weekley responded to Craigslist ads with the following titles: "looking for the very dark and kinky women"; "dirty emails"; "taboo"; and "perv guy."

14. Relevant here, law enforcement conducted further investigation of the ad to which Weekley responded that was titled "taboo." The body of the "taboo" ad indicated that the person who posted the ad was interested in sexual topics related to "family, forced" and "K9 and more," that there were "No limits," and "minor." The ad was posted by an individual utilizing the email account colsbuckeye315@gmail.com. Information provided by Craigslist revealed that, in January of 2018, Weekley exchanged numerous emails with the person who posted this ad via the Craigslist email network. As indicated above, through comparison of the Craigslist post ID number for this ad and the emails recovered from Weekley's email account, it was determined that the content of some of these email exchanges was found on William Weekley's cellular phone and in the results of the search warrant issued for his email account. The content of the emails that were able to be recovered reveals that the user of the email account

² The information provided by Jane Doe indicates that Weekley began sexually abusing her sometime in the summer or fall of 2017. For this reason, records from Craigslist were only sought starting in May of 2017. In light of the nature of Weekley's activities in May of 2017, there is reason to believe that Weekley may have been communicating about his sexual interest in minors prior to May of 2017.

colsbuckeye315@gmail.com was interested in incest and sexual activity with minors. Weekley informed colsbuckeye315@gmail.com that he had “messed around” with Jane Doe and that she was young. Weekley further described the specific sex acts he had engaged in with Jane Doe. During the email string, colsbuckeye315@gmail.com asked Weekley what he had done with Jane Doe, and after Weekley explicitly stated what he had done, colsbuckeye315@gmail.com replied, “Damn that is hot. We wish we could join in on something like that.” Weekley and colsbuckeye315@gmail.com continued to discuss various sex acts and, during their exchange, colsbuckeye315@gmail.com stated, “Well your situation is our dream,” and later, “We love the family thing and we also like young. We do share pics, just not right away. Got a ton of videos of her being fucked bareback by strangers.”³ The emails from colsbuckeye315@gmail.com continue with him saying, “Do you think you’d ever let anyone else join you? We really want to find some active family that we can join.”

15. Further investigation of the email account colsbuckeye315@gmail.com revealed that the IP address used to access the account on numerous occasions during the month of December 2017 was assigned to Arena Lofts Condominiums, at 221 N. Front Street, Columbus, Ohio 43215, and that Arena Lofts Condominiums utilized this IP address to provide free and open wi-fi access within the building. Information provided by Google revealed that the user of the colsbuckeye315@gmail.com account provided the name “G M” and a recovery email account of michalski.26@gmail.com. Review of the names of the tenants of the Arena Lofts Condominium building revealed that a G Michalski resided in condo number 105. According to records with the Ohio Law Enforcement Gateway (OHLEG), Grant Michalski has a reported address of 221 N. Front Street, # 105, Columbus, Ohio.

C. Further investigation revealed that MICHALSKI possessed over 1400 images of child pornography, and was actively seeking out child pornography and to sexually exploit minors.

16. On August 10, 2018, a federal search warrant was executed at 221 N. Front Street, # 105, Columbus, Ohio. The search warrant revealed that Grant MICHALSKI and Peter Glover reside at the residence. Multiple electronic devices, media, and computers were seized during the search.

³ This reference to videos is unclear from the context whether colsbuckeye315@gmail.com was referring to an adult or a child.

17. A smart phone was seized from MICHALSKI's person when the search warrant was executed. A preliminary examination of the smart phone revealed an associated email address for that phone to be michaelski.26@gmail.com.

18. A search of MICHALSKI's bedroom revealed an Apple MacBook Pro Laptop, sitting next to the bed on a nightstand. A forensic examination of the laptop was performed subsequently. To date, the examination revealed more than 1400 images of child pornography present on the laptop computer, which had file created dates dating back to at least January of 2014, and which had last accessed dates through at least May of 2018. By way of example, descriptions of two of the images are as follows:

- a. **41729.jpg**—This image depicts an adult male wearing a white shirt and white shorts inserting his penis into the mouth of a young female girl approximately two years old. The young girl is laying on a bed and is wearing an orange shirt.
- b. **ww10 (26).jpg**—This image depicts a nude adult male performing oral sex on a young boy approximately 6-8 years old who is laying on a bed.

19. Further examination of MICHALSKI's laptop revealed the TOR browser installed. The TOR browser is frequently used by individuals seeking to remain anonymous and to potentially facilitate illicit and/or criminal activity. Relevant here, based on training and experience, the TOR browser is often used by individuals downloading child pornography. Additionally, IEF results revealed MICHALSKI visits the "The Pirate Bay," which is used in the downloading of Torrent files via a Torrent client. Torrent files are frequently used in the downloading and distribution of child pornography.

20. Law enforcement conducted additional investigation based upon variants of the colsbuckeye315 username, including on the Kik Messenger App (Kik). Kik is a messaging app that allows for a short retention time for chats logs, and further allows a user to destroy all evidence from a chat by simply deleting their Kik messenger account.

21. The additional investigation revealed that, on April 13, 2017, an undercover law enforcement officer started chatting with a user associated with the name of columbusbuckeye315 on Kik. Relevant portions of that chat are as follows:

Columbusbuckeye315:	Are you active with your kids. Would love to join on that.
Undercover:	I am
Columbusbuckeye315:	Ever have anyone join in?

Undercover: One guy about a year ago but that's it
Columbusbuckeye315: Do you have a daughter? Would you let me have fun with her?
Undercover: I have 2
Columbusbuckeye315: Even better. Been my fantasy to have a mom and a daughter together.
Columbusbuckeye315: If you have a son that would be fun to have him join in as well
Undercover: Do you have any children?
Columbusbuckeye315: None unfortunately
Columbusbuckeye315: Although I want to some day and have fun with them like you do with yours.

22. Later in the Kik conversation columbusbuckeye315 stated, "I'm not trying to rush or anything. But just want to make sure you know I'm for real about meeting up."

23. Pursuant to the present investigation, law enforcement conducted a search for the username columbusbuckeye315 on Kik. That search revealed that a Kik user utilizing the username columbusbuckeye315 had provided an associated name of "G M."

24. Information received from Kik in response to a subpoena, revealed that Kik account colsbuckeye315 had been accessed utilizing the IP address 74.203.74.2. This is the same IP address that Google reported had been utilized to access the colsbuckeye315@gmail account on numerous dates in December of 2017, and which was assigned to the Arena Loft Condominiums, 221 N. Front Street, Columbus, Ohio.

25. Also as part of the present investigation, in July of 2018 law enforcement executed a search warrant on the account of colsbuckeye315@gmail.com, which, according to information provided by Google, relates to the name "G M" and has a recovery email address of michalski.26@gmail.com. A review of the returned content analyzed to date shows that MICHALSKI, using the email address of colsbuckeye315@gmail.com, has posted or responded to online ads on the Craigslist website with the following subject headings within the last year: "16 yo anal virginity," "daddy mommy looking," "dark taboo," "into taboo," "looking for a mom into extreme taboo," "looking for taboo and kinky," "love taboo," "love taboo sex," "men obsessed with incest with mom and dad," "mommy daddy," "osu son obsessed with dad son incest," "perv looking for perv," "social incest," "taboo 16 yo," "taboo," and "young incest." (Based on training and experience, "taboo" is often used to indicate a sexual interest in minors.)

A review of these communications revealed that MICHALSKI made repeated statements of his interest in seeing pictures of minor children engaging in sexual activity, and his interest in engaging in sexual activity with minor children. Specifically, the communications contain MICHALSKI's repeated statements that he is interested in "incest" and participating in incestuous relationships that involve minor children.

26. For example, in January of 2018, MICHALSKI participated in an email exchange with an individual who posted a Craigslist ad with a subject of "taboo." In the course of that exchange, the poster of the ad stated that he was "30" and had "a younger daughter." MICHALSKI asked if the poster was sexually active with his daughter, to which the poster responded, "Yeah she is 11 now." MICHALSKI responded, "That's hot! We'd love to be able to join. What kind of stuff do you guys do?" The poster responded as follows: "Maybe if we hit it off lol. We been playing but nothing too crazy yet. Trying to go slow about it but it's hard. What would you want to do?" MICHALSKI responded, "We'd love to be able to taste her." When the poster responded, "Love to see that," MICHALSKI said, "We have to get together sometime." MICHALSKI again asked the poster what he and his "daughter do." The poster said, "Just toy play so far. I buy the smallest ones I can find. Been going slow and seems to be working fine lol. You played with any younger?" MICHALSKI responded as follows: "I but we've been dying too. We talk about it all the time. She likes the thought of us taking turns eating a young girls pussy and ass together at the same time. We gotta meet up sometime. If you got Kik we can chat there."

27. As another example, also in January of 2018, MICHALSKI participated in an email exchange with an individual who posted another Craigslist ad with a subject of "taboo." The individual was represented in the email exchange as "Eric Justice." In the context of discussing incest and sexual activity with the children of the poster referred to as Eric Justice, and after Eric Justice represented to MICHALSKI that he had "two boys" who were "younger" and a "girl," and that the youngest of his kids was 7, MICHALSKI asked Eric Justice if he would let "her," presumably MICHALSKI's girlfriend or a female associate, "suck [Eric Justice's] boys cocks." Eric Justice responded, "hell yes I want her to suck both of them." MICHALSKI went on to make the following the statements:

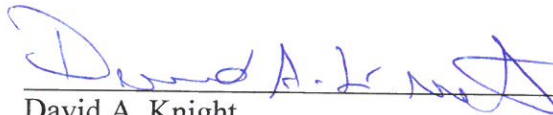
- a. Regarding potential sexual activities with Eric Justice's family: "I'd love to have them try to breed my girl. They can cum in her all they want. I wanna eat your

daughter too. I'm sure my girl does too. She loves to eat pussy."

- b. In response to a statement by Eric Justice about MICHALSKI's "girl and my girl getting fucked by the boys while you and I hang around with our cocks being played with by my daughter," MICHALSKI stated: "I know she'd love to teach them how to fuck. She could definitely teach your daughter too."
- c. In response to Eric Justice saying, "maybe my daughter's ass would have a bullseye for your cock to stick in it," MICHALSKI stated, "That's perfect."
- d. In the context of the conversation, MICHALSKI went on to make numerous and repeated graphic statements regarding his desire to engage in sexual activity with Eric Justice's three children.


28. Pursuant to Ohio Revised Code § 2907.04, it is a felony under the laws of Ohio for any person who is eighteen years of age or older to engage in sexual conduct with another person who is not the spouse of the offender, when the offender knows that other person is thirteen years of age or older but less than sixteen years of age. Sexual conduct is defined pursuant to O.R.C. § 2907.01 to include anal sexual intercourse, fellatio, cunnilingus and the insertion of any object into the vaginal or anal opening of another.

29. Based upon the above information, your affiant submits that there is probable cause to believe that Grant MICHALSKI has committed violations of 18 U.S.C. § 2252 and 2252A, receipt and possession of a visual depiction of a minor engaging in sexually explicit conduct and of child pornography. Therefore, your affiant respectfully requests this Court issue a criminal complaint and arrest warrant.



David A. Knight
Special Agent
Federal Bureau of Investigation

Sworn to and subscribed before me this 23rd day of August, 2018.



Kimberly A. Jolson
United States Magistrate Judge
United States District Court
Southern District of Ohio

